



# Manual “OLSdigital” Issuers

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## 0. Important information and legal foundations

### 0.1. Important information

Unless otherwise stated, the term “investor” includes any type of person subject to notification duty as well as a plural number of persons subject to notification duty. This means, in particular, that a group of investors is also covered by the term “investor”.

This instruction manual relates to the submission of a disclosure notification on the designated “OLSDigital” platform, but not to legally compliant disclosures.

The parties or their legal representatives must assess the specific case in terms of disclosure duties. SIX Exchange Regulation AG is not authorised to provide binding information in the field of disclosure of shareholdings, i.e. in the non-self-regulated area.

The “review” of disclosure notifications by the Disclosure Office of SIX Exchange Regulation AG (“Disclosure Office”) therefore only represents a formal review, i.e. a check in terms of coherence and completeness of the disclosure notification. The Disclosure Office accepts no responsibility whatsoever for the content and correctness of disclosure notifications.

SIX Exchange Regulation AG accepts no responsibility for the correctness and completeness of this instruction manual. In particular, no responsibility is assumed for ensuring that the specified articles of law, legal foundations, links and other references are current, complete and applicable in the respective case.

Furthermore, SIX Exchange Regulation AG is not responsible for ensuring that disclosure notifications are correctly marked as “Most recent” or not “Most recent”. The issuers are responsible for submitting the correct information. The Disclosure Office reserves the right to point out any discrepancies in the information provided.

### 0.2. Legal foundations

Federal Act on Financial Market Infrastructures and Market Conduct in Securities and Derivatives Trading (Financial Market Infrastructure Act, [FinMIA](#))

Ordinance on Financial Market Infrastructures and Market Conduct in Securities and Derivatives Trading (Financial Market Infrastructure Ordinance, [FinMIO](#))

Ordinance of the Swiss Financial Market Supervisory Authority on Financial Market Infrastructures and Market Conduct in Securities and Derivatives Trading (FINMA Financial Market Infrastructure Ordinance, [FinMIO-FINMA](#))

Notices of the Disclosure Office ([Notice III/99, III/00, etc.](#))

Rules for the Disclosure Office of SIX Swiss Exchange ([PDF](#))

Directive on Electronic Reporting and Publication Platforms, DERP ([PDF](#))

### **0.3. Additional links**

[Published disclosure notifications \("Significant Shareholders"\)](#)

[Reports and tools of the Disclosure Office](#)

[Communications of SIX Exchange Regulation and the Regulatory Board on the disclosure of shareholdings](#)

[Topics regarding the disclosure of shareholdings on the website of SIX Exchange Regulation \(ser-ag.com\)](#)

[Central Business Name Index \(zefix.ch; as a gateway to the relevant commercial register\)](#)

# 1. General information on the “OLSdigital” platform and login

## 1.1. General information

Registered (and activated) users can use the “OLSdigital” platform to publish disclosure notifications under Art. 120 FinMIA as an issuer (including notifications regarding their own shares).

In principle, there are two processes, depending on the approach of the investor submitting the disclosure notification:

- a) The investor files the disclosure notification himself on the “OLSdigital” platform and you as the issuer publish it via the “OLSdigital” platform (see Chap. 3).
- b) The investor sends you the disclosure notification (e.g. in PDF form) via e-mail or mail and you as the issuer enter and publish the disclosure notification on the “OLSdigital” platform (see Chap. 4).

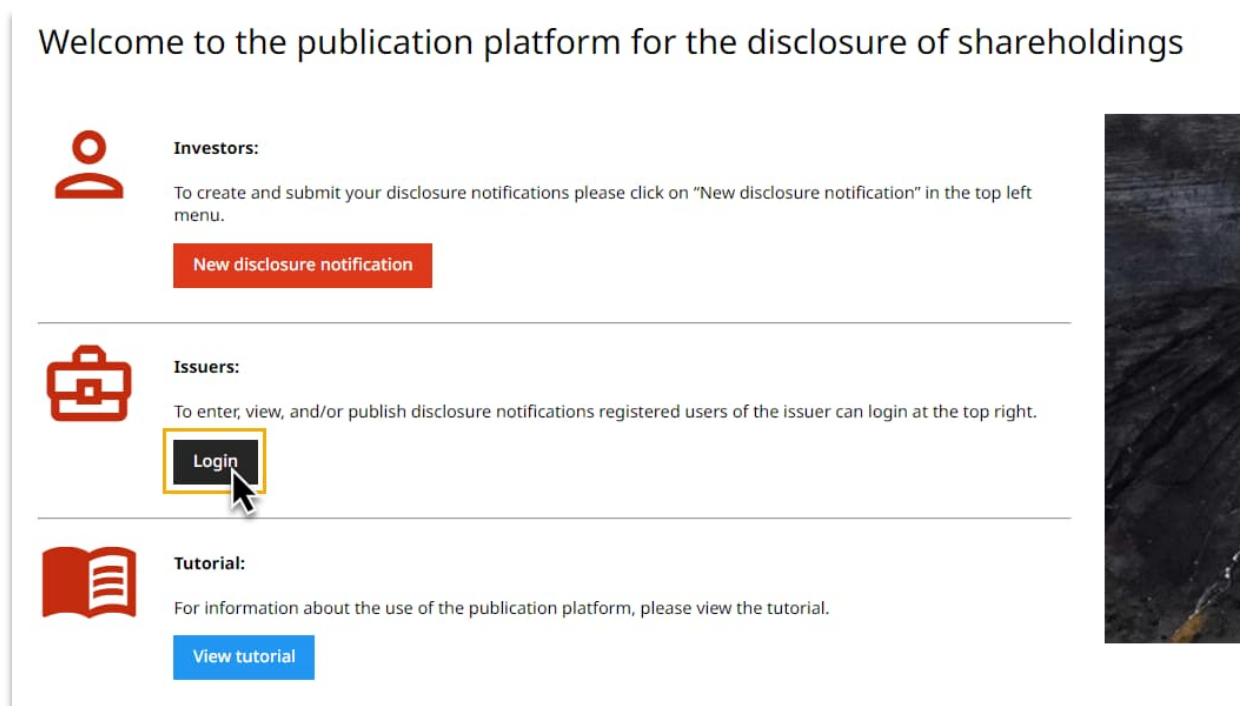
Furthermore, you as a user can view your personal profile. Depending on your rights, you can view the user group and if needed administer it on the old platform (administration; see Chap. 7).

## 1.2. Login

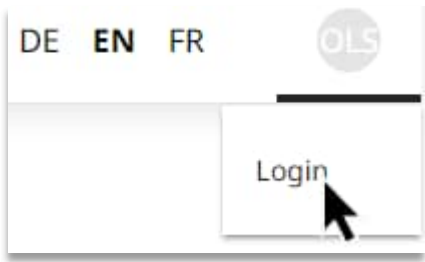
The following link is used to log in to the “OLSdigital” platform:

<https://disclosure.six-exchange-regulation.com/gui/en/cug/authentication/login>

The login page can also be accessed via the “Login” button on the “Welcome page”:



or via the menu in the top right corner:



**Only registered (and activated) users** can log in (**new users** can register as shown in Chap. 7.1.):

A screenshot of a login form titled 'Login'. The form contains three input fields: 'User ID \*' with a person icon, 'Group ID \*' with a group of people icon, and 'Password \*' with a lock icon and a visibility toggle icon. Below the fields are two buttons: 'Forgot my password' and 'Login'.

**“User ID”**: Enter the e-mail address of the user.

**“Group ID”**: Enter the user group assigned to the issuer.

**“Password”**: Enter your password.

If the password is lost, you can reset the password using the **“Forgot my password”** button.

## 2. Overview pages and notification view

### 2.1. Opening overview pages and actions

Once you have logged in as a user, you will find five overview pages in the menu at the top-left:

The screenshot shows the user interface of the SIX disclosure notification platform. On the left, there is a navigation menu with five items, each highlighted with a yellow border: 'Platform notifications from all investors', 'PDF notifications from single investor', 'PDF notifications from group of investors', 'PDF notification from collective investment scheme', and 'Summary of all disclosure notifications'. Below these is a 'Walk through Tutorial' link. The main content area features a 'Welcome' message and a detailed explanation of the platform's purpose and user permissions. It states that users can view and publish disclosure notifications entered by the investor, either individually or jointly. It also mentions that users can view and administer their personal profile and user group. Contact information for the disclosure office is provided at the bottom, including a phone number (+41 58 399 3030) and an email address (disclosure-office@six-group.com).

- 1. Platform notifications from all investors:** Overview of the notifications submitted by investors via “OLSdigital” platform that need to be formally reviewed by you as the issuer and published if correct (see Chap. 3). Moreover, you can view old (submitted in this way) notifications, make amendments if necessary or delete them (see Chap. 5.2 & 5.3) and adjust the “Most recent” flag (see Chap. 5.1.1).
- 2. PDF notifications from single investor:** Here you can enter and publish notifications from single investors that you have received via e-mail or mail (i.e. not via “OLSdigital” platform) (see Chap. 4). Moreover, you can view old (submitted in this way) notifications, make amendments if necessary or delete them (see Chap. 5.2 & 5.3) and adjust the “Most recent” flag (see Chap. 5.1.1).
- 3. PDF notifications from group of investors:** Here you can enter and publish notifications from groups of investors that you have received via e-mail or mail (i.e. not via “OLSdigital” platform) (see Chap. 4). Moreover, you can view old (or submitted) notifications, make amendments if necessary or delete them (see Chap. 5.2 & 5.3) and adjust the “Most recent” flag (see Chap. 5.1.1).
- 4. PDF notification regarding a collective investment scheme:** Here you can enter and publish notifications from collective investment schemes that you have received via e-mail or mail (i.e.

not via “OLSDigital” platform) (see Chap. 4). Moreover, you can view old (submitted in this way) notifications, make amendments if necessary or delete them (see Chap. 5.2 & 5.3) and adjust the “Most recent” flag (see Chap. 5.1.1).

- 5. Summary of all disclosure notifications:** Here you can find all disclosure notifications in one overview page.

To narrow down or expand the notifications shown, the **time period** can be defined on the respective overview page; furthermore, it is possible to display only **notifications marked as “Most recent”**.



In addition, the notifications can be sorted according to the **criteria in the columns** (e.g. publication date):

ID	Status	Submission date	Publication date	Investor	Category	Trigger	Percentage purchase/sale	Transaction date	Most recent	Investor tag	Formal check
----	--------	-----------------	------------------	----------	----------	---------	--------------------------	------------------	-------------	--------------	--------------

On the individual overview pages, the “Most recent” flags (“Most recent”) and investor tags (“investor tag”) (see Chap. 5.1.1) can also be adjusted directly in the respective column.

Furthermore, you can open the individual notifications (i.e. the “notification view”; see Chap. 2.3) and carry out certain actions depending on the status of the notification (see following Chap. 2.2).

## 2.2. Notification status

The status of the disclosure notification is shown in the overview page. Depending on the type of notification (received via platform or via e-mail or mail) and depending on its status, a different set of actions is possible. A disclosure notification can have one of the following seven status:

- **Draft:** The disclosure notification was completely or partially entered by you as an issuer, but has not yet been submitted for review or publication. In “the Draft” status, the notification can be edited, submitted, published or deleted.
- **Prepared (only for four eyes principle):** The disclosure notification received via e-mail or mail was recorded by a user (see Chap. 4 & 6) and submitted for internal validation.
- **Submitted:** The disclosure notification is being formally reviewed by the Disclosure Office. The disclosure notification can no longer be edited. For further information on notifications received

from the investor via “OLSdigital” platform, see Chap. 3, and for notifications received from the investor via e-mail or mail, see Chap. 4.

– **Rejected:**

- (i) the Disclosure Office found inconsistencies during the formal review (i.e. for coherence and completeness) of the disclosure notification you submitted, which you received from the investor via e-mail or mail (see Chap. 4), and rejected the disclosure notification for revision. The disclosure notification can now be edited or deleted again (see Chap. 4.2.3).
- (ii) You rejected the notification for revision by the investor (see Chap. 3.1.1).
- (iii) In case of the four eyes principle, the second user rejected the notification for revision by the first user (see Chap. 6).

**Note:** Disclosure notifications that were submitted by the **investor via “OLSdigital” platform** (see Chap. 3) and have been **rejected** by you or the Disclosure Office are **no longer displayed** on the overview page until a possible resubmission by the investor (see Chap. 3.3).

- **Withdrawn:** The investor submitted a notification, but subsequently withdrew it. Until the notification has been resubmitted by the investor it is no longer displayed (see Chap. 3.3). If the notification is resubmitted, the status “Withdrawn” is shown in the disclosure notification history (see Chap. 2.4).
- **Published:** The disclosure notification was published (before or after the conclusion of the formal review by the Disclosure Office).
- **Obsolete:** An already published disclosure notification has become obsolete due to a correction or deletion notification.


### 2.3. Opening the notification view and actions

Via the overview page you can enter into single notifications (“notification view”) to perform different actions. Depending on the notification status the notification view will vary and different actions are possible. For an exact description of the possible actions according to status, see Chap. 2.2.


You can access a notification by clicking on the following links or icons:

[ZA01-.....](#) (“ID”): The notification can be viewed but not edited.

<a href="#">XA01-000000004558</a>	Submitted	07.02.2024 11:48:19	Person, Test	Single investor
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 (“**Review**”): Notifications you have submitted as issuer for review can be viewed. They cannot be edited until rejected by the Disclosure Office. You can review notifications submitted by the investor via “OLSDigital” platform. If the notification should be revised by the investor, you can reject the notification (see Chap. 3.1). If you consider the notification to be correct, it may be published before or after the formal review by the Disclosure Office (see Chap. 3.2).



 (“**Edit**”): The notification has “Draft” status and can be further edited, submitted or deleted, or the notification has “Published” status and can be amended or deleted.



## 2.4. Disclosure notification history

The disclosure notification history records the following information:

- Version of the disclosure notification (PDF)
- Status of a disclosure notification
- Editor
- Time of status update
- Comments

### 2.4.1. Version of the disclosure notification and PDF generation

It is possible to generate a PDF of the version of the notification with “Draft”, “Submitted” and “Published” status. For the version of a draft a PDF can only be created until the status changes (e.g. to “Submitted”). For the version of the notification with “Rejected”, “Prepared” or “Obsolete” status no PDF can be generated. Clicking on the following symbol generates a PDF of the desired notification version:

Disclosure notification history	
Status	Edited by
 Submitted	Investor
Draft	Investor

For drafts:

Click on «View disclosure notification” and then on “PDF of current draft”:

**Disclosure notification concerning a single investor**

Continue process View disclosure notification Delete draft disclosure notification Submit disclosure notification

Disclosure notification history

Status	Edited by	Date
Draft	Issuer	31.05.2024 08:56:30

Attachments ⓘ

No attachments are available

DISCLAIMER: I am aware that the disclosure notification has not yet been formally reviewed by the disclosure office: nevertheless, I would like to proceed.  This is the most recent disclosure notification

PDF of current draft Back to Cockpit

### 2.4.2. Status

The status of the notification at the respective time is displayed. For an explanation of the individual status types, see Chap. 2.2.

### 2.4.3. Editor, date and time

For each status the affiliation of the person who processed the disclosure notification and the respective time of processing will be displayed.

The following personal affiliations exist:

- Investor
- Issuer
- Staff (Disclosure Office)

### 2.4.4. Comments

If (i) after the review the Disclosure Office rejects or you as the issuer reject the disclosure notification for revision by the investor, a comment must be entered. If (ii) the Disclosure Office after

its formal review or (iii) the second user in case of the four eyes principle (see Chap. 6) rejects the disclosure notification entered by you as the issuer for revision, a comment must be entered as well. The investor or you can use the comment to amend the disclosure notification (see Chap. 4.2.3)

Disclosure notification history			
Status	Edited by	Date	Comment
Rejected	Issuer	07.02.2024 14:49:08	<a href="#">See comment</a>
 Submitted	Investor	05.02.2024 09:05:39	
Draft	Investor	05.02.2024 08:59:43	

### 2.4.5. Attachments

Attachments, e.g. accompanying letters, may be uploaded or uploaded documents downloaded in the “Attachments” section under “Disclosure notification history” in order to provide further information for the Disclosure Office and/or for you as the issuer. When you enter the notification for the investor, you can also upload attachments.

**Note:** All content of the disclosure notification (Art. 22 FinMIO-FINMA) must be submitted as such in the disclosure notification. **Attachments will not be published on the publication platform. Attachments are intended to inform the Disclosure Office and/or you as the issuer and cannot replace the submission of disclosure notification content.**

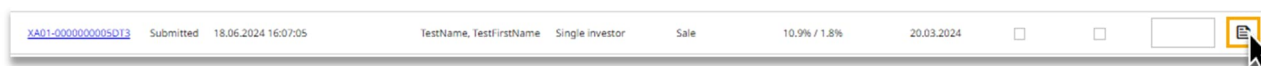
### 3. Reviewing and publishing notifications (received via “OLSdigital” platform)

#### 3.1. Reviewing notifications

Investors can submit notifications via “OLSdigital” platform. This means that the investor submits the notification himself on the “OLSdigital” platform, rather than sending a PDF to you as the issuer, which you enter for the investor for publication purposes. As a user, you can see these notifications submitted by the investor via “OLSdigital” platform by expanding the start menu at the top-left and by selecting the overview “Platform notifications from all investors” (see Chap. 2.1).

Upon submission by the investor, the notification is immediately available to the Disclosure Office for a formal review (for an explanation of this formal review, see Chap. 3.2.1 & 3.2.2).

Notifications with “Submitted” status can be opened and reviewed by you as the issuer by clicking on the following icon:



The different parts of a notification can now be displayed either simultaneously by clicking “Expand all” or separately by expanding the categories individually.



##### 3.1.1. Rejecting the notification to the investor for correction or deletion

If the notification is to be rejected to the investor in order for him to amend or delete the notification, “Reject disclosure notification” should be clicked. In the pop-up field, the reasons (“comment”) for the rejection must be stated to enable the investor to amend the notification accordingly. Further and detailed explanations can also be attached in a separate document (e.g. PDF with screenshots).

DISCLAIMER: I am aware that the disclosure notification has not yet been formally reviewed by the disclosure office:  This is the most recent disclosure notification (3% or more) nevertheless, I would like to proceed.

### Reject to the investor

Please add a comment

(Why do you want to reject the disclosure notification?)

Please amend ...

Attachments

**Note:** Disclosure notifications that were **submitted by the investor via "OLSDigital" platform** and **rejected** by you as the issuer or by the Disclosure Office are **no longer displayed** on the overview page until a possible resubmission by the investor.

### 3.2. Publishing notifications

If in your opinion the notification is ready to be published, a distinction must be made as to whether the formal review by the Disclosure Office has also been completed or if it is still pending. This can be seen in the overview page "Platform notifications from all investors" in the column "Formal review"; this value cannot be adjusted by you.

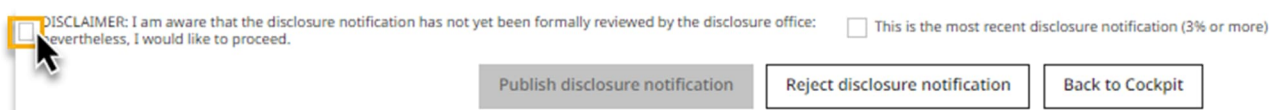
ID	Status	Submission date	Publication date	Investor	Category	Trigger	Percentage purchase/sale	Transaction date	Most recent	Formal review	Investor tag
<a href="#">XA01-0000000000SDSS</a>	Submitted	18.06.2024 15:55:45		TestName, TestFirstName	Single investor	Sale	10.9% / 1.8%	20.03.2024	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="text"/>
<a href="#">XA01-0000000000SDSS</a>	Submitted	18.06.2024 15:55:45		TestName, TestFirstName	Single investor	Sale	10.9% / 1.8%	20.03.2024	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="text"/>

### 3.2.1. After the formal review by the Disclosure Office

If the formal review by the Disclosure Office has already been completed (check mark “Formal review” set in the overview page; see Chap. 3.2 above), the notification can be published directly. Subsequent amendments to published notifications remain possible, but generally, are only carried out at the express request of the investor or the Disclosure Office (see Chap. 5.2 & 5.3).

### 3.2.2. Before the formal review by the Disclosure Office

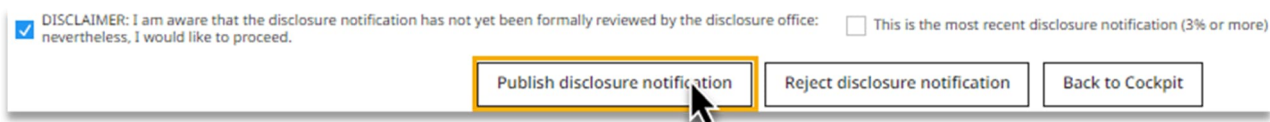
If the formal review by the Disclosure Office has not yet been completed (check mark “Formal review” not set in the overview page; see Chap. 3.2 above), the corresponding “DISCLAIMER: ...” must be accepted prior to publication:



DISCLAIMER: I am aware that the disclosure notification has not yet been formally reviewed by the disclosure office:  This is the most recent disclosure notification (3% or more) nevertheless, I would like to proceed.

This is the most recent disclosure notification (3% or more)

Publish disclosure notification    Reject disclosure notification    Back to Cockpit



DISCLAIMER: I am aware that the disclosure notification has not yet been formally reviewed by the disclosure office:  This is the most recent disclosure notification (3% or more) nevertheless, I would like to proceed.

This is the most recent disclosure notification (3% or more)

Publish disclosure notification    Reject disclosure notification    Back to Cockpit

**Note:** If the formal review by the Disclosure Office shows that the submitted notification needs be corrected, it should be noted that the issuer is obligated to correct or delete the published notification (see Chap. 5.2 & 5.3). **As long as the publication deadlines according to Art. 24 para. 3 or 4 FinMIO-FINMA (see Chap. 4.1.3) can be met, it is not recommended to publish the disclosure notification prior to the formal review by the Disclosure Office.**

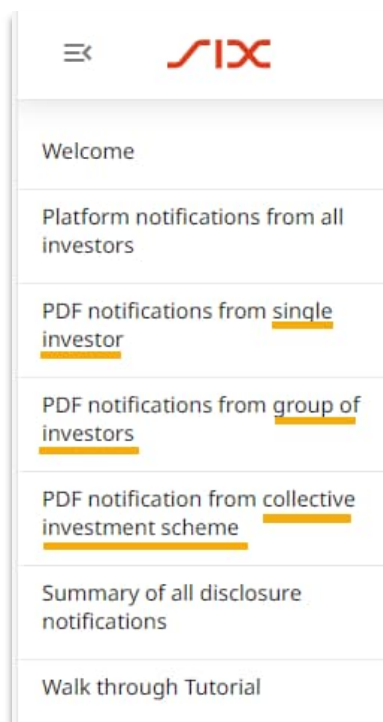
### 3.3. Has a notification disappeared?

Disclosure notifications that were submitted by the investor via “OLSdigital” platform and rejected by you or the Disclosure Office are no longer displayed on the overview page “Platform notifications from all investors” until a possible resubmission by the investor. Notifications corrected and deleted after publication are displayed as “Obsolete” (see Chap. 5.2 & 5.3).

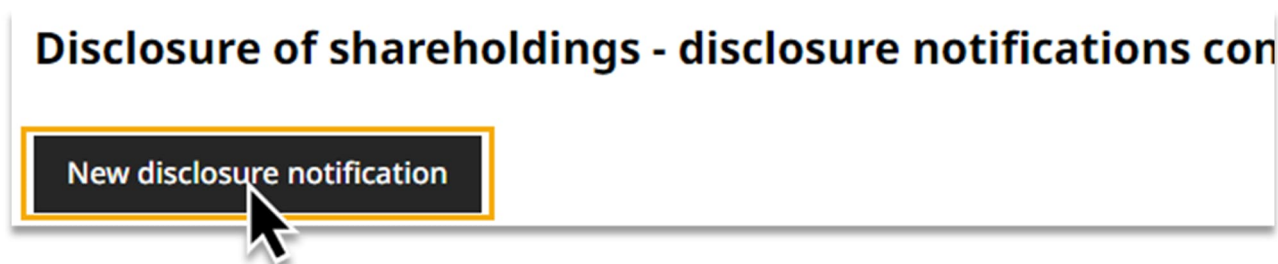
## 4. Submitting notifications (received via e-mail or mail)

### 4.1. Entering and submitting new notifications

If you have been sent a disclosure notification via e-mail or mail from the investor (rather than submitting the notification directly on the “OLS digital” platform), you as the issuer must enter the disclosure notification on the “OLSdigital” platform. In order to submit a disclosure notification, log in and select the appropriate overview page in the menu on the top-left, depending on the type of investor (single investor, group of investors or collective investment scheme):



To submit a new notification, click on the following button on the selected overview page:



The data reported by the investor may now be entered in the corresponding fields in the submission view. Please note the following Chap. 4.1.1 and 4.1.2 in this connection.

You also have the option to use a previous notification of the same investor as a template (“clone”, see Chap. 4.1.4).

### 4.1.1. Interdependence between two fields and implemented logic

Please note that certain fields and information are interdependent. For example, the implemented logic causes certain input fields to appear or disappear, depending on the selection that has been made.

### 4.1.2. Enabling and disabling automatic calculations

Various **calculations** are **performed automatically by default once the changes have been saved in the top right corner**. The addition of voting rights from the different positions to a (sub-)total and the calculation of the percentages of individual and total positions are **automatic**, based on the "Total number of voting rights pursuant to entry in the commercial register" in the section "Date and reason". Please enter **the information in the form you received from the investor by e-mail or mail** into the following field:

The screenshot shows a web form with a progress bar at the top consisting of six numbered circles (1-6) connected by a line. Below the progress bar are six tabs: 'Single investor', 'Indirect participation', 'Date and reason', 'Purchase positions', 'Sale positions', and 'Remarks'. The 'Date and reason' tab is currently selected and underlined. Below the tabs, there is a section titled '\*Mandatory field' and 'Date and reason for the notification duty'. This section contains several input fields and checkboxes:

- 'Date of the event triggering the notification duty \*' with a date picker icon and the placeholder 'dd.MM.yyyy'.
- 'Date of transfer of equity securities (if different from date of the event triggering the notification duty)' with a date picker icon and the placeholder 'dd.MM.yyyy'.
- 'Date of the disclosure notification by the investor' with a date picker icon and the placeholder 'dd.MM.yyyy'.
- 'Trigger events for notification duty \*' with a list of checkboxes:
  - Acquisition
  - Creation of a group
  - Termination of a group
  - Securities lending and comparable transactions
  - Exercise, non-exercise or expiration of derivative holdings
  - Capital reduction
  - Change in the information subject to the obligation to notify
  - Voting rights total <3% (total of purchase AND sale positions)
  - Sale
  - Change in group composition
  - Discretionary exercise of voting rights
  - Granting (writing) of derivative holdings
  - Capital increase
  - Ipsa jure transfer or transfer due to a decision by
  - Other

At the bottom of the form, there is a field titled 'Total number of shares pursuant to entry in the commercial register\*' with a help icon (i) and a large empty text input box highlighted with a yellow border.

**The Automatic calculations can be disabled** if the results **significantly** differ from the information in the investor's notification. However, in the event of larger discrepancies that mean the investor's notification cannot be reproduced based on the automatic calculation, automatic calculations can be disabled in the section "Purchase positions" or "Sale positions" (e.g. for purchase positions):

1 2 3 4 5 6

Single investor Indirect participation Date and reason **Purchase positions** Sale positions Remarks

\*Mandatory field

**Subcategories**

Equity securities or equity related securities

Voting rights that can be exercised with full discretionary powers ⓘ

Derivative holdings ⓘ

**Total of all purchase positions**

Total number of shares pursuant to entry in the commercial register	<input type="text" value="200"/>	<input type="checkbox"/> Disable automatic calculations
Number of reported voting rights	<input type="text"/>	
Percentage of reported voting rights	<input type="text"/>	%

### 4.1.3. Submission for review by the Disclosure Office or direct publication

Pursuant to Art. 24 para. 3 FinMIO-FINMA, you as the issuer must publish the notification **within two trading days** of receipt of the notification.

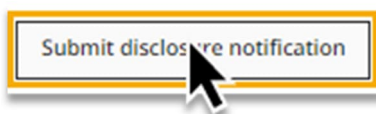
In the case of transactions in **proprietary securities**, you as the issuer must provide notification to the competent disclosure office and publish the notification **within four trading days** of the triggering of the notification duty (para. 4).

Once you have fully entered the disclosure notification on the “OLSdigital” platform, you have – **subject to the deadline pursuant to Art. 24 para. 3 or 4 FinMIO-FINMA and the deadline by the Disclosure Office** (see the following two Sections) – the option to choose whether you wish to submit the notification directly for publication or have the entries reviewed for formal correctness by the Disclosure Office prior to publication.

#### 4.1.3.1. Submission for review by the Disclosure Office

If an entry is to be formally reviewed by the Disclosure Office in advance, the entry must be submitted to the Disclosure Office no later than 12 noon on the second trading day after you have received the notification as the issuer (see also Art. 11 & 19 of the Directive on Electronic Reporting and Publication Platforms, DERP, [PDF](#)). If the Disclosure Office considers the submitted publication to be formally acceptable, it will be released for publication and the notification will be published on the website “Significant Shareholders” on the following day prior to 7.30 a.m. If the publication is formally insufficient, the Disclosure Office will reject and return it to you as the issuer for

amendments. The notification can be submitted in the submission view or notification view by clicking on the following button and then selecting the option "Submit for review".



### Submission of the disclosure notification

Do you really want to submit the disclosure notification?

I am aware that the disclosure notification has not yet been formally reviewed by the disclosure office and I want to move forward anyway.

This is the most recent disclosure notification (3% or more)

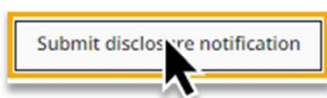
**Submit for review** Publish! Back to process

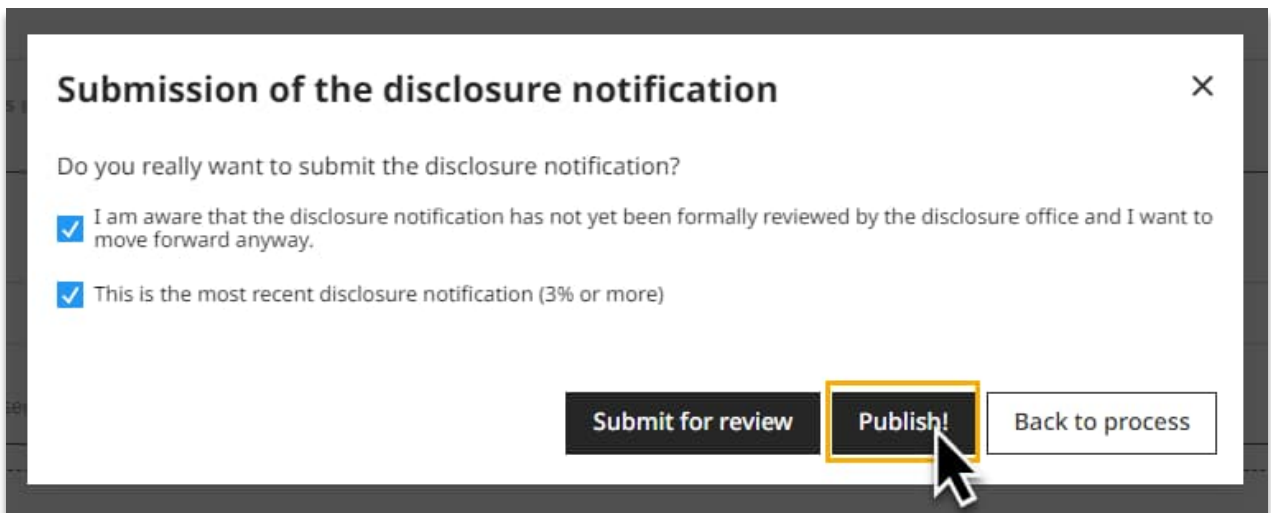
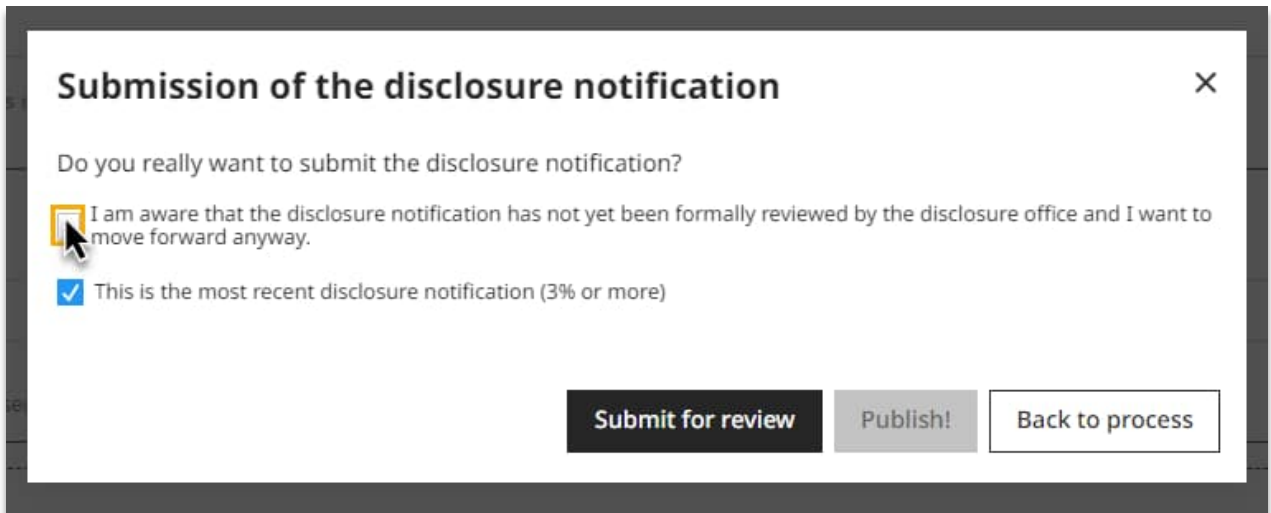
#### 4.1.3.2. Submission for direct publication

If you, as the issuer, decide to submit the notification for direct publication, you must do so before midnight of the second trading day following receipt of the notification in order to comply with the deadline pursuant to Art. 24 para. 3 FinMIO-FINMA (in case of own shares according to para. 4 before midnight of the fourth trading day following the trigger event). It will then be published on the website "Significant Shareholders" on the following day prior to 7.30 a.m. (see also Art. 11 of the Directive on Electronic Reporting and Publication Platforms, DERP, [PDF](#)).

To publish the notification directly, you have to accept the disclaimer "I am aware that the disclosure notification has not yet been formally reviewed by the disclosure office and I want to move forward anyway."

**Note:** As long as the publication deadlines according to Art. 24 para. 3 or 4 FinMIO-FINMA (see Chap. 4.1.3) can be met, it is **not recommended** to publish the disclosure notification prior to the formal review by the Disclosure Office. Published notifications cannot be simply changed but need to be corrected or deleted as described in Chap. 5.2 and 5.3.

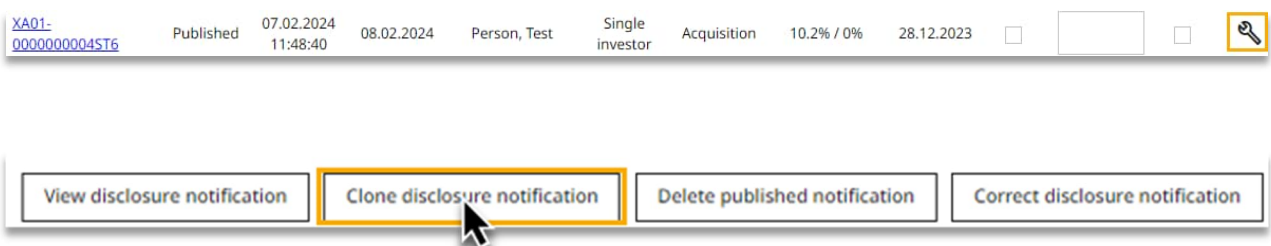




#### 4.1.4. Using a previous notification as a template (“clone”)

Notifications you (but not the investor via the platform) have previously submitted and published (excluding corrected and deleted notifications) can be used as a template for subsequent publications. This allows you to use the data that you have already entered in the past when entering notifications from an investor.

On the overview page, open the notification you wish to clone via the following icon and then click on “Clone disclosure notification” in the submission view:



A new disclosure notification will be created as a draft for the investor of the cloned notification and the notification view will open. As soon as you click on "Start process", all information that was previously entered in the original notification will already be entered in the submission view.

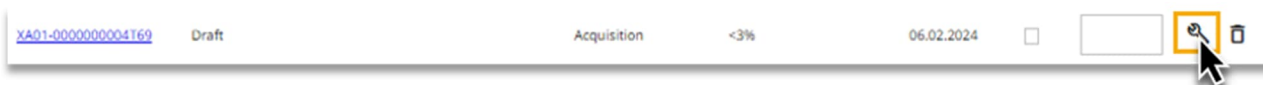
Cloning previous notifications may save you time when entering the information from the investor's new notification. **However, it is important to note that various entries in the cloned notification will need to be changed to reflect the investor's new notification.**

**Note:** In principle, all automatically filled entries must be verified and compared with the notification from the investor. Besides the date of the event triggering the notification duty and the reason for the event triggering the notification duty, any entry (including the "Total number of voting rights pursuant to entry in the commercial register" as the basis of all calculations) and any individual position and other information may have changed in the meantime.

## 4.2. Amending unpublished notifications

### 4.2.1. Draft status

Notifications that have been partially or fully entered, but not yet submitted, can be changed or amended ("Continue process") and can then be submitted ("Submit disclosure notification").



### 4.2.2. Submitted status

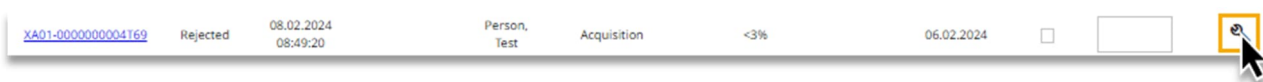
Notifications with "Submitted" (for review) status will be reviewed by the Disclosure Office prior to publication. You cannot change the notification as long as it has this status. If the Disclosure Office rejects it, you can work on it again (see Chap. 4.2.3). If the notification proceeds to "Published" status after having been reviewed by the Disclosure Office, the published notification can then only be corrected (for the requirements, see Chap. 5.2).

### 4.2.3. Rejected status

As the issuer, you can amend and re-submit notifications with "Rejected" status. This is the case, for example, in the following scenarios:

- (i) The Disclosure Office identified inconsistencies during the formal review of the disclosure notification you submitted as issuer and rejected the disclosure notification for amendments.
- (ii) In case of the four eyes principle, the second user rejected the notification for revision by the first user (see Chap. 6.4).

The notification view for the amendments can be opened by clicking on the following icon:



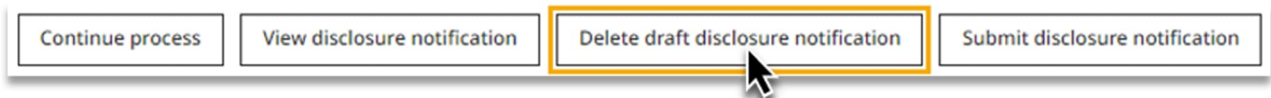
In the “Disclosure notification history” in the notification view, you can find a comment explaining the reason for the rejection:

Status	Edited by	Date	Comment
Rejected	Staff	08.02.2024 08:38:34	<a href="#">See comment</a>
 Submitted	Investor	08.02.2024 08:36:27	
Draft	Investor	08.02.2024 08:36:27	

### 4.3. Deletion of unpublished notifications

#### 4.3.1. Draft status

Notifications that have been partially or fully entered, but not yet submitted, can be **irreversibly** deleted in the notification view using the “Delete draft” button.



On the overview page, the notification can be **irreversibly** deleted by clicking on the following icon:



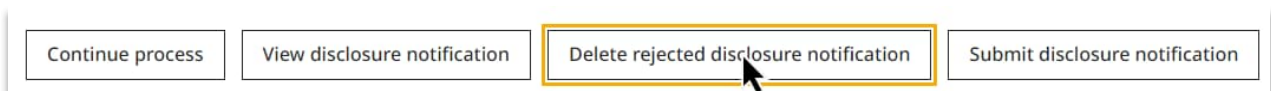
#### 4.3.2. Submitted status

Notifications with “Submitted” (for preliminary review) status will be reviewed by the Disclosure Office prior to publication. So long as the notification has this status, it cannot be deleted by you. It can be deleted only if the Disclosure Office rejects the notification.

If the notification proceeds to “Published” status after having been reviewed by the Disclosure Office, the published disclosure notification can be deleted under certain conditions (see Chap. 5.3).

#### 4.3.3. Rejected status

Notifications with “Rejected” status can be **irreversibly** deleted in the notification view by clicking on “Delete rejected disclosure notification”:



## 5. Published notifications

### 5.1. "Most recent" flag

The "Most recent" flag is intended to ensure that only the most recent or newest notification (if the shareholdings are above 3%) of any given investor is displayed as "Current notified shareholdings" on the website ["Significant Shareholders"](#). **You as the issuer are responsible for the correct setting of the flags. Therefore, you must check them after every (new) notification.**

In order to determine which notification should have a "Most recent" flag, it should, as a rule of thumb, generally be considered whether **the same person(s) subject to notification duty** is/are concerned and whether the **date of the event triggering the notification duty is more recent**. It should be noted that, changes to the "Most recent" flags are likewise subject to overnight processing; changes therefore only become visible on the "Significant Shareholders" website on the following day.

- Note 1:** In line with the rule of thumb and to avoid disclosure notifications incorrectly not being displayed as "Most recent", the "Most recent" flag is automatically set for newly submitted notifications (3% or more per cent). This means that for notifications that are not submitted in chronological order of the dates of the triggering of the notification duty ("Transaction date"), the last submitted notification (with an earlier date of the triggering of the notification duty) will also be displayed as "Most recent".
- Note 2:** For notification with the indication **"Voting right total <3% (total of purchase AND sale positions)"** in the "Date and reason" section, the **"Most recent" flag cannot be set**, as such notifications are not considered "Current notified shareholdings". For **notifications for which this has not been selected in the "Date and reason" section, but for which both the reported purchase and sale positions are below 3%, the "Most recent" flag can be set, but has no effect on the "Significant shareholders" page**, as such notifications are not considered "Currently notified shareholdings".
- Note 3:** The **"Most recent" flags of other notifications will not be affected by changing the flag of the newly submitted notification**. This also applies when a notification is cloned. Therefore, the "Most recent" flags must always be checked and, as the case may be, changed after a new notification is published.

The two different methods for changing the "Most recent" flag are described in the following sub-chapters.

#### 5.1.1. Changes in the overview pages

In each of the five overview pages (e.g. "Platform notifications from all investors" or "Summary of all disclosure notifications", see Chap. 2.1), you can select or deselect the corresponding box of a notification in the "Most recent" column (for a rule of thumb, see Chap. 5.1 above).

Percentage purchase/sale	Transaction date	Most recent
0% / 23%	09.01.2024	<input type="checkbox"/>

Percentage purchase/sale	Transaction date	Most recent
0% / 23%	09.01.2024	<input checked="" type="checkbox"/>

### 5.1.2. Changes relating to the publication process

The “Most recent” flag can also be set when publishing a new notification (3% or more). A corresponding tick can be set above the submission button:

See in case of a notification entered by the investor via “OLSdigital” platform:

DISCLAIMER: I am aware that the disclosure notification has not yet been formally reviewed by the disclosure office: nevertheless, I would like to proceed.

This is the most recent disclosure notification (3% or more)

DISCLAIMER: I am aware that the disclosure notification has not yet been formally reviewed by the disclosure office: nevertheless, I would like to proceed.

This is the most recent disclosure notification (3% or more)

See in case of a notification entered by you for the investor:

**Submission of the disclosure notification** ×

Do you really want to submit the disclosure notification?

I am aware that the disclosure notification has not yet been formally reviewed by the disclosure office and I want to move forward anyway.

This is the most recent disclosure notification (3% or more)

### Submission of the disclosure notification ✕

Do you really want to submit the disclosure notification?

I am aware that the disclosure notification has not yet been formally reviewed by the disclosure office and I want to move forward anyway.

This is the most recent disclosure notification (3% or more)

Submit for review
Publish!
Back to process

## 5.2. Correction of published notifications

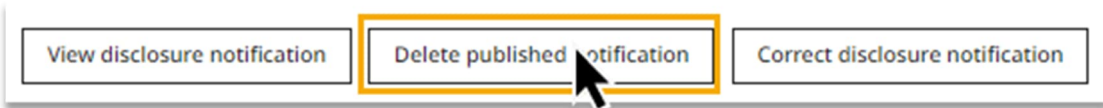
Notifications approved for publication can be changed or supplemented in the notification view using the “Correct disclosure notification” button. This function should **only be used in exceptional cases and at the express request of the investor or Disclosure Office.**



After submitting such correction notifications, these are always reviewed first by the Disclosure Office prior to publication (and hence, prior to the modification of a published notification). After the publication it will be indicated that a publication has been corrected.

## 5.3. Deletion of published notifications

Notifications approved for publication can be removed from the “Significant Shareholders” website in the notification view using the button “Delete published disclosure notification”. This function should only be used in exceptional cases and at the request of the investor or Disclosure Office. As a rule, published notifications can only be deleted if the notification was published by mistake.



Pressing the button submits a deletion notification. This notification is always reviewed first by the Disclosure Office before the relevant publication on the website “Significant Shareholders” is removed.

## 6. Four eyes principle (only for notifications via e-mail or mail)

### 6.1. In general

The use of the four eyes principle is voluntary and should be considered as an option. If you, respectively your user group consider it useful to only permit the publication of a disclosure notification, once it has been checked by a second user of the “OLSDigital” platform, this function can be enabled in the profile of the user group.

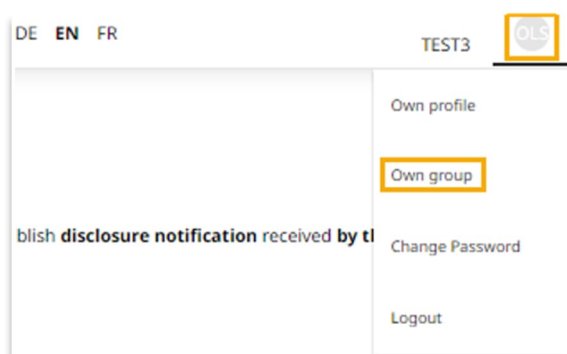
If the four eyes principle is enabled, a publication or the submission of a disclosure notification for review by the Disclosure Office can only occur once a second user of the issuer’s user group internally authorises the corresponding notification.

When activating the four eyes principle, you must, with its use, organise yourself in the user group in a way that ensures compliance with deadlines (see Chap. 4.1.3).

**Note:** The four eyes principle is only applicable for the **submission and publication of notifications entered by you as the issuer** (see Chap. 4) (i.e. for the **issuer’s own shareholdings**, for example, or when a **notification is submitted via e-mail or mail** and entered by you as the issuer). **Conversely, the four eyes principle cannot be applied for the publication of notifications, which have been submitted by the investor directly via the “OLSDigital” platform (see Chap. 3); in this case, the general principles apply.**

### 6.2. Activation / Deactivation

To activate the four eyes principle, a user with administrator rights can configure the necessary settings in the “Own group” area. After the activation, certain actions have to be performed by two users (see Chap. 6.3 - 6.5.)



The user with administration rights can confirm the change by subsequently pressing “Edit group” at the bottom of the page. For the time being, users are for this purpose referred to the previous application, [https://disclosure.six-exchange-regulation.com/obligations/management\\_transaction/ddeal/login\\_en.html](https://disclosure.six-exchange-regulation.com/obligations/management_transaction/ddeal/login_en.html)

After the login “Change group profile” can be selected in the “Admin” section and subsequently, the box “Four eyes principle” can be activated or deactivated. The change can then be saved by clicking on the “Save group profile” button.

- ▼ Issuer Reporting
- ▼ Management Transactions / Disclosure of Shareholdings
- Welcome
- Management Transactions
- My Profile
- Admin
- Logout

## User group administration

User group	TEST3
Issuer name	
Street / p.o. box	
ZIP city	
Country	
Homepage	
Contact person	
Telephone no.	
E-mail	
Language	<input type="radio"/> German <input checked="" type="radio"/> English <input type="radio"/> French
Four-eyes principle	<input checked="" type="radio"/> No <input type="radio"/> Yes

Change group profile

- ▼ Issuer Reporting
- ▼ Management Transactions / Disclosure of Shareholdings
- Welcome
- Management Transactions
- My Profile
- Admin
- Logout

## User group administration

Group id	TEST3
Issuer name	
Street / p.o. box*	
ZIP city*	
Country*	
Homepage	
Contact person*	
Telephone no.	
E-mail	
Language	<input type="radio"/> German <input checked="" type="radio"/> English <input type="radio"/> French
Four-eyes principle	<input checked="" style="border: 1px solid orange;" type="radio"/> No <input type="radio"/> Yes

Save group profile
Cancel

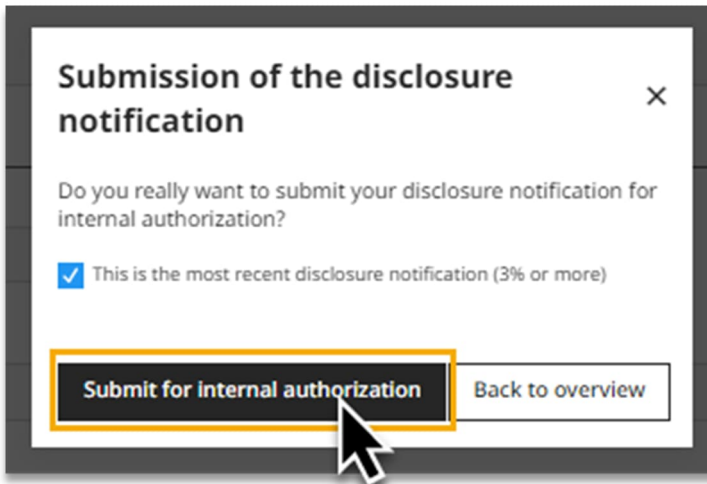
\* Please fill in these fields.

### 6.3. Submission for internal authorisation

#### 6.3.1. Step 1

User 1 creates (or “clones”) a notification by clicking on “New disclosure notification” on the corresponding overview page (depending on the type of investor, see Chap. 4 and regarding “cloning”, see Chap. 4.1.4.)

Once User 1 has entered all the data, he can click on the button “Submit disclosure notification” to submit the notification for internal authorisation by User 2.



After this step the notification will appear on the overview page (see Chap. 2.1) and in the disclosure notification history in the notification view (see Chap. 2.4) with the status "Prepared". User 1 can no longer edit the notification while it has this status.

### 6.3.2. Step 2

The function of User 2 can be performed by any active users of the user group except for User 1. User 2 can check the data submitted by User 1 by clicking on the icon ("Edit") on the right side of the overview page of submitted notifications and then on "View disclosure notification" in the notification view:



After performing the check, User 2 has the following options:

- a) He can reject the notification by clicking on "Reject disclosure notification" in the notification view if he believes it requires revision. In this case, User 2 must enter a comment for User 1 in the field "(Why do you want to reject the disclosure notification?)", specifying the points that need to be added or amended:



User 1 can then edit the notification accordingly and submit it for internal authorisation again.

Alternatively, User 2 can also edit the notification himself after rejection. In this case, he must likewise submit the notification for internal authorisation by another user, using the button "Submit for internal authorization". I.e. the notification can again only be checked, rejected or submitted by another user (as User 2).

- b) User 2 can submit the notification to the Disclosure Office for review "Submit for review" after clicking on "Submit disclosure notification" (see Chap. 4.1.3.1).
- c) User 2 can approve the notification for direct publication "Publish" after clicking on "Submit disclosure notification" (see Chap. 4.1.3.2).

#### **6.4. Correction of rejected notifications**

If the Disclosure Office rejects the notification for correction, it can be amended accordingly by any user in the user group. The notification must then be authorised or re-submitted to the Disclosure Office by a second user in the user group as described above in steps 1 and 2 (see Chap. 6.3.1 & 6.3.2).

#### **6.5. Correction and deletion of published notifications**

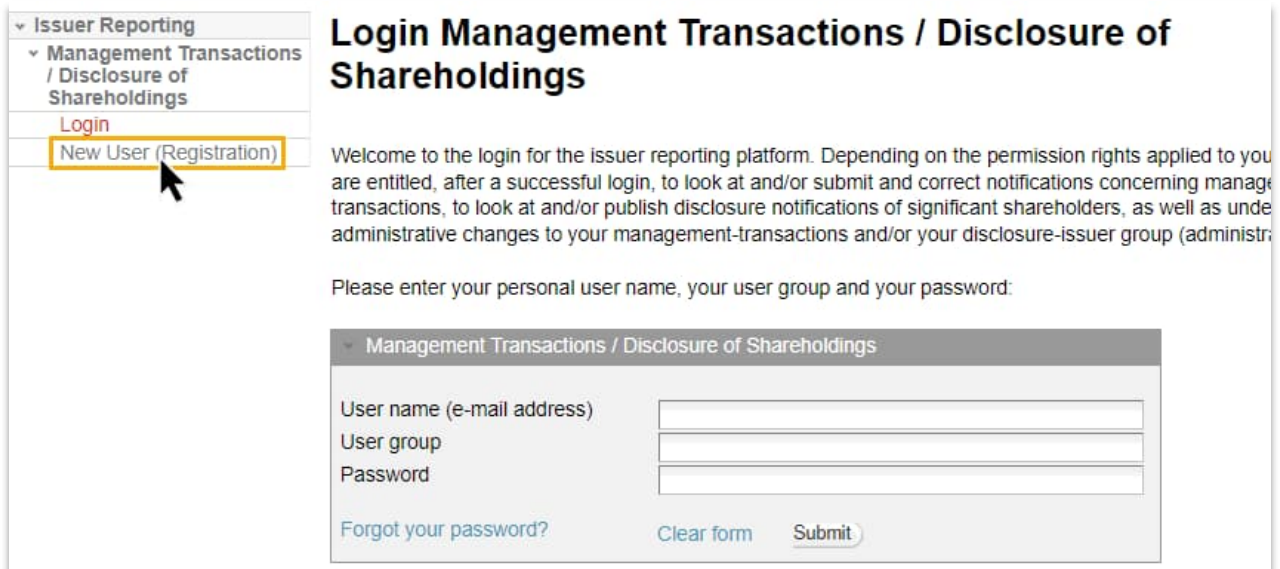
The four eyes principle also applies to the correction and deletion of published notifications according to the rules described above.

## 7. Administration

### 7.1. New user

New users can register themselves.

The new user opens the login page for the old issuer platform ([https://disclosure.six-exchange-regulation.com/obligations/management\\_transaction/ddeal/login\\_en.html](https://disclosure.six-exchange-regulation.com/obligations/management_transaction/ddeal/login_en.html)).



**Issue Reporting**

- Management Transactions / Disclosure of Shareholdings
  - Login
  - New User (Registration)**

## Login Management Transactions / Disclosure of Shareholdings

Welcome to the login for the issuer reporting platform. Depending on the permission rights applied to you are entitled, after a successful login, to look at and/or submit and correct notifications concerning management transactions, to look at and/or publish disclosure notifications of significant shareholders, as well as under administrative changes to your management-transactions and/or your disclosure-issuer group (administrative changes).

Please enter your personal user name, your user group and your password:

Management Transactions / Disclosure of Shareholdings

User name (e-mail address)

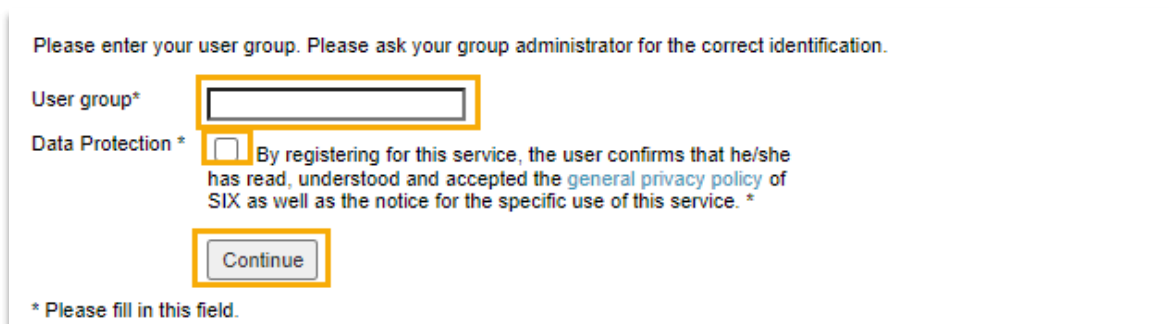
User group

Password

[Forgot your password?](#) [Clear form](#) [Submit](#)

Subsequently, he can click on “New User (Registration)” on the left side.

There he enters the name of the user group (which can be communicated to him by already existing users), reads the privacy statement and then selects “Data Protection”. Next, he clicks on “Continue”.



Please enter your user group. Please ask your group administrator for the correct identification.

User group\*

Data Protection \*  By registering for this service, the user confirms that he/she has read, understood and accepted the [general privacy policy](#) of SIX as well as the notice for the specific use of this service. \*

[Continue](#)

\* Please fill in this field.

- ▼ Issuer Reporting
- ▼ Management Transactions / Disclosure of Shareholdings
- Login
- New User (Registration)

## Register a new user

This user application consists of three steps:

1. Use this form to apply for a user account for the MT Reporting Platform / DO Publication Platform. Please use the user group of your company for this purpose.
2. You will receive an automatically generated e-mail, which will allow you to confirm your user application.
3. Your user account can be activated by your group administrator.

First name\*

Family name\*

E-mail\*

Telephone no.\*

Fax no.

Password\*

Repeat password\*

User group

Desired roles

look at disclosure notifications  
 publish and correct disclosure notifications  
 look at management-transactions-notifications  
 submit and correct management-transactions-notifications  
 administrate users of the reporting platform

Apply for account

\* Please fill in these fields.

He fills in the fields (fields with an asterisk are mandatory), marks the desired role and clicks on "Request user". He will immediately receive a confirmation e-mail. He follows the instructions and confirms the request as described in the e-mail.

A user with administrator rights must now activate the requested account. To this end, the latter must proceed as follows:

Login to the old issuer platform ([https://disclosure.six-exchange-regulation.com/obligations/management\\_transaction/ddeal/login\\_en.html](https://disclosure.six-exchange-regulation.com/obligations/management_transaction/ddeal/login_en.html)) and click on "Admin".

- ▼ Issuer Reporting
- ▼ Management Transactions / Disclosure of Shareholdings
- Welcome
- Management Transactions
- My Profile
- Admin
- Logout

## User group administration

User group

Issuer name

Street / p. o. box

ZIP city

Country

Homepage

Contact person

Telephone no.

E-mail

Language

Four-eyes principle

German  
 English  
 French  
 No  
 Yes

Change group profile

The new user will appear at the bottom of the admin overview with the status "NEW". As soon as he has verified himself according to the automatic e-mail received, he will appear with registered status "REG". The requested account can now be activated at any time. To do so, the user with

32/36

administrator rights clicks on the green icon. The new account should now appear with the status "ACT".



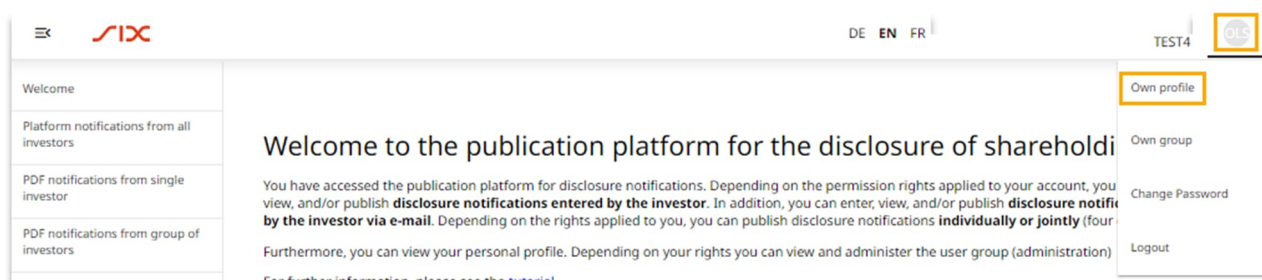
The new user's account is active.

Once a user with administrator rights has activated the account, the new user can log in to the platform.

## 7.2. Own user profile

### 7.2.1. Adjusting own profile

The user profile can be adjusted at any time under "Own profile" after logging in. For this purpose, you will be directed to the previous issuer platform.

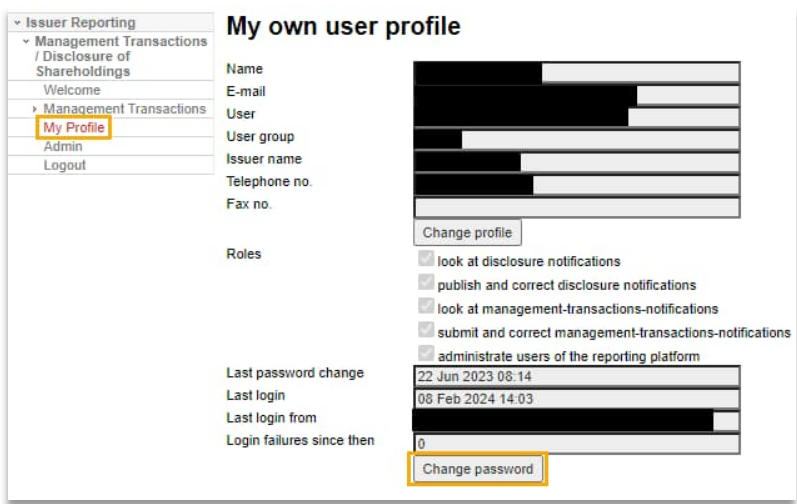


For a change of first name, surname or telephone number "Change profile" can be clicked. Afterwards the changes can be made and saved by clicking on "Save profile". Please note that grey fields cannot be changed.

For technical reasons, it is currently not possible to change the user ID (e-mail address with which the users log in to the platform). Therefore, the users must register with the new e-mail address and be activated (see Chap. 7.1). The user with the old e-mail address can then be deleted (see Chap. 7.3.3).

### 7.2.2. Changing password

The password can be changed at any time under "Change Password" after logging in. You will then be directed to the previous issuer platform for this purpose ([https://disclosure.six-exchange-regulation.com/obligations/management\\_transaction/ddeal/login\\_en.html](https://disclosure.six-exchange-regulation.com/obligations/management_transaction/ddeal/login_en.html)). The password can be changed under "My Profile" by clicking on "Change Password".

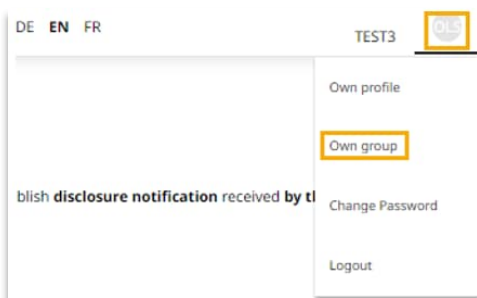


The password consists of at least six characters of numbers and/or letters including a special character; the password is freely chosen by the user and is unknown to SIX Swiss Exchange AG. Only the corresponding user is able to change the password. Although the responsibility lies entirely with the issuer, the Disclosure Office recommends changing the password regularly.

### 7.3. User group (only users with administrator rights)

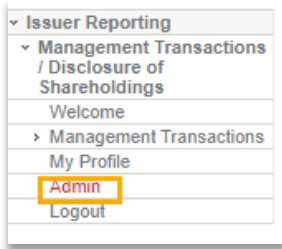
#### 7.3.1. General

The administration of the user group is located in the section "Own group":



The user can make the change by subsequently pressing "Edit group" at the very bottom of the page. For the time being, the user is for this purpose, referred to the previous application, [https://disclosure.six-exchange-regulation.com/obligations/management\\_transaction/ddeal/login\\_en.html](https://disclosure.six-exchange-regulation.com/obligations/management_transaction/ddeal/login_en.html)

After logging in, changes can be made in the "Admin" section.







### 7.3.2. Changing rights

If the user has administrator rights, he can customise his own user profile accordingly (after logging into the previous issuer platform; see Chap. 7.3.1). In particular, the user can also assign himself other rights by clicking on the following icon in the “Actions” column:



The following rights are available:

Legend	
Role	Privileges
	review and publish disclosure of shareholders-notifications
	look at management-transactions-notifications
	administrate groups and staff users
	look at disclosure notifications

If the user does not have any administrator rights, changes to his rights must be carried out by an administrator.

### 7.3.3. Suspension and deletion of a user

In the “Admin” menu (after logging into the previous issuer platform; see Chap. 7.3.1), any user with administrator rights can delete or suspend another user. This is done by a click the orange icon for suspend and by the red icon for delete.



The user profiles do not disappear from the user group; in the “Status” column, they will instead appear as “SUS” (for suspended) and “DEL” (for deleted).

Suspended users can be reactivated, while deleted users cannot.

You are responsible for keeping the user group up-to-date. This is the only way you can ensure that, for example, employees who leave your company, no longer have access to the platform.

#### **7.3.4. Adjusting group profile**

The group profile can also be changed (after logging into the previous issuer platform; see Chap. 7.3.1). To do so, click “Change group profile” in the “Admin” menu of the user group.

The user group cannot be changed at present. This is permanently assigned for technical reasons and is not changed even in the event of a change of company.